

## EXHIBIT 389

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

-----) MDL No. 2804  
IN RE: NATIONAL PRESCRIPTION )  
OPIATE LITIGATION )  
-----) Case No. 17-md-2804  
THIS DOCUMENT RELATES TO: )  
ALL CASES )  
-----) Hon. Dan A. Polster

HIGHLY CONFIDENTIAL  
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF  
ELLEN WILSON

January 24, 2019

Indianapolis, Indiana

1 A. -- Sherri Hinkle.

2 Q. Any other circumstances when you would go  
3 to somebody?

4 A. No.

5 MR. HYNES: Objection to form.

6 BY MR. GOETZ:

7 Q. How would you judge if an order was too  
8 big?

9 MR. HYNES: Objection to form.

10 BY MR. GOETZ:

11 Q. Let me ask you a question because this is  
12 actually important.

13 You said that you would go to Ms. Hinkle  
14 if an order was too big, correct?

15 A. Yes.

16 Q. You would alert her?

17 A. Yes.

18 Q. So you would have to make that judgment,  
19 correct?

20 A. Yes.

21 Q. How would you make that judgment?

22 MR. HYNES: Objection to form.

23 BY THE WITNESS:

24 A. When you're in there day in and day out

1     you just know when an order is too big.

2     BY MR. GOETZ:

3           Q.     Mr. Milikan testified it was a gut  
4     feeling?

5           A.     Yes.

6           MR. HYNES:   Objection.

7     BY MR. GOETZ:

8           Q.     Would you agree it's a gut feeling?

9           A.     Yes.

10          Q.     Okay.   And I appreciate that, but  
11     unfortunately we are going to have to explain to  
12     experts and a jury what that means.

13                  So what does that mean, that gut feeling?

14          MR. HYNES:   Objection to form.

15     BY THE WITNESS:

16          A.     You just know after you're in there day in  
17     and day out what's a big number.   Like if they are  
18     ordering, like, five, five, five and then all of a  
19     sudden there is 150, that's a red flag.

20     BY MR. GOETZ:

21          Q.     When you say "they are ordering" --

22          A.     The --

23          Q.     -- "five, five, five"?

24          A.     On the pick document, if it says --

1 every -- every item in that cage they want five and  
2 then all of a sudden it shoots up to, like, 150, that  
3 would be a red flag.

4 Q. Okay. So if -- if they want five  
5 Amoxicillin and then 150 hydro, that's a problem.

6 Is that what I'm hearing you say?

7 A. Amoxicillin is not in the cage.

8 Q. So what is in the cage? You talked about  
9 testosterone.

10 A. Testosterone.

11 Q. If they want five units of -- of  
12 testosterone and 150 of hydro, that to you is a sign  
13 there is a problem?

14 A. Yes.

15 Q. What else is a sign that there is a  
16 problem?

17 MR. HYNES: Objection to form.

18 BY THE WITNESS:

19 A. Charlotte Rucker, when she trained me, she  
20 said as -- we have three different size bottles of  
21 hydrocodone in the cage. She said, As a rule you send  
22 out 12 -- no more than 12 of the little ones, six of  
23 the big ones and two to three of the bigger -- the  
24 large size ones as a rule across the board.